

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION)
This document relates to:)
The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al.)
Case No. 18-op-45090)
and)
The County of Cuyahoga v. Purdue Pharma L.P., et al.)
Case No. 1:18-op-45004)

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

**CARDINAL HEALTH, INC.'S
OBJECTIONS TO PLAINTIFFS' DEPOSITION DESIGNATIONS**

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in *In re National Prescription Opiate Litigation* (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), Defendant Cardinal Health, Inc. submits the following Objections to Plaintiffs' Affirmative Deposition Designations. Attached as Exhibit A are Cardinal Health's objections to Plaintiffs' designations of certain deposition testimony of Steven Reardon. Attached as Exhibit B are Cardinal Health's objections to Plaintiffs' designations of certain deposition testimony of Jennifer Norris.

Because Plaintiffs have withdrawn all deposition designations to certain previously identified Cardinal Health witnesses (Eric Brantley, Todd Cameron, Christopher Forst, Mark Hartman, Steven Morse, and Gilberto Quintero), Cardinal Health is not filing objections thereto. However, if Plaintiffs were to attempt to play the depositions of these witnesses at trial

(to which Cardinal Health would object), Cardinal Health reserves the right to serve responsive designations or objections to these withdrawn depositions.

Cardinal Health further reserves all rights, including all rights to revise or withdraw Objections based on, for example, the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial. Consistent with prior representation by Plaintiffs' counsel that "objections and colloquy will not be proffered" by Plaintiffs, Cardinal Health has not objected to every objection or colloquy on a line-by-line basis. Cardinal Health objects to the playing of any objections or colloquy as a global matter.

Cardinal Health makes its objections pursuant to the following Objections Key:

Code	Objection
402	Relevance. FRE 402.
403	Undue Prejudice, Confusion, Waste of Time. FRE 403.
408	Inadmissible Evidence of Settlement or Negotiations. FRE 408.
602	Lack of Foundation / Calls for Speculation. FRE 602.
802	Hearsay. FRE 802.
AA	Asked and Answered. FRE 611(a).
AF	Assumes Facts Not in Evidence. FRE 103(d), 611(a).
ARG	Argumentative. FRE 611(a).
AU	Authentication Lacking. FRE 901.
BER	Best Evidence Rule. FRE 1002.
CML	Cumulative. FRE 403, 611(a).
CMP	Compound Question. FRE 611(a).
CO	Contrary to Court Order.
DEM	Demonstrative Not Marked as Exhibit. FRE 103(d), 611(a).
HYP	Improper Hypothetical. FRE 602, 701.
ILO	Improper Opinion of Lay Witness. FRE 701.
INC	Designation Incomplete; Incomprehensible.
LC	Calls for a Legal Conclusion. FRE 103(d), 602, 701.
LDG	Leading. FRE 611(c).
MD	Misstates the Document. FRE 103(d), 611(a).
MPT	Misstates Prior Testimony. FRE 103(d), 611(a).
NAR	Calls for Narrative Response. FRE 103(d), 611(a).
NR	Nonresponsive. FRE 611(a).
PV	Privileged. FRE 103(d), 501, 502.
SCP	Outside the Scope of Designated Topics. FRE 602, 611(a)–(b); FRCP 30(b)(6).
SUM	Improper Summary. FRE 1006.
VG	Vague and ambiguous. FRE 611(a).

Dated: October 2, 2019

Respectfully submitted,

/s/ Enu Mainigi

Enu Mainigi
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Fax: (202) 434-5029
emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on October 2, 2019 via electronic transfer to all counsel of record, consistent with the Court's order.

/s/ Enu Mainigi
Enu Mainigi